

# Exhibit 2

Declaration of Christian Solomon

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

REPUBLICAN NATIONAL COMMITTEE,  
NEVADA REPUBLICAN PARTY, and  
SCOTT JOHNSTON,

Plaintiffs,

v.

FRANCISCO AGUILAR, in his official  
capacity as Nevada Secretary of State;  
LORENA PORTILLO, in her official capacity  
as the Registrar of Voters for Clark County;  
WILLIAM “SCOTT” HOEN, AMY  
BURGANS, STACI LINDBERG, and JIM  
HINDLE, in their official capacities as County  
Clerks,

Defendants.

Case No. 2:24-cv-00518-CDS-MDC

**DECLARATION OF CHRISTIAN  
SOLOMON**

I, CHRISTIAN SOLOMON, under penalty of perjury, hereby declare as follows:

1. I am over eighteen years of age. I have personal knowledge of the facts set forth herein. If called upon to testify before this Court, I would do so to the same effect.

2. I am a resident of Clark County, Nevada.

3. I am currently the Nevada State Director of Rise Action Fund (“Rise”).

4. In my capacity as State Director, I am responsible for overseeing Rise’s operations within the state of Nevada, including the training and recruiting of organizers, fellows, and volunteers, as well as the campaign work performed by our organizers, fellows, and volunteers.

5. Rise is a national student-led 501(c)(4) nonprofit organization that runs student-focused advocacy and vote mobilization programs in states across the country. Rise’s mission is to fight for free higher public education and ending homelessness, housing insecurity, and food insecurity among college students. Rise also strives to be responsive to its student constituents, and accordingly each state organization often pursues goals based on local student concerns. To achieve that mission, Rise is committed to empowering and mobilizing students in the political

1 process. It has trained thousands of students across the country in how to be civically engaged  
2 forces for change in their communities.

3 6. Rise expanded into Nevada in 2023. At the time, Nevada did not have any statewide  
4 organization dedicated to promoting the interests of young people and students between the ages  
5 of 18 and 27—Rise’s core constituency. I was hired as State Director to build up Rise’s operations  
6 within the state. My role as State Director is a full-time paid position.

7 7. Rise operates based on an organizer model, meaning that we recruit and train  
8 organizers and part-time organizers (known as fellows) who then marshal and supervise volunteers  
9 in campaign actions meant to further our mission. We recruit and train student volunteers through  
10 what we call “Rise University” events, which train students about how to be civically engaged  
11 volunteers around our key organizational goals.

12 8. One of my first acts as State Director was to recruit and train two lead organizers—  
13 full time paid positions—dedicated to serving the University of Nevada, Las Vegas (“UNLV”). I  
14 also organized a Rise University training event at UNLV for student volunteers and recruited  
15 several campus fellows, a part time paid position for students who assist our lead organizers. My  
16 goals for 2024 include bringing on a Deputy Director and expanding our organizer footprint to  
17 other schools within the state, including the University of Nevada, Reno (“UNR”), which is  
18 Nevada’s flagship state university.

19 9. The Nevada chapter of Rise shares the national organization’s mission, and  
20 accordingly one of our major goals at the moment is educating Nevada students about various  
21 student aid, loan repayment, and debt relief programs. It is a priority for us to educate students  
22 about the Biden Administration’s recently announced SAVE Plan, which offers repayment  
23 assistance and debt forgiveness to students. Very few students are aware of this new program,  
24 however. As a result, our organizers are planning to have volunteers phone bank students to  
25 educate them about the program.

26 10. Our Rise chapter has also made gun violence prevention a major objective.  
27 Tragically, our inaugural training on UNLV’s campus coincided with a mass shooting event on  
28 UNLV’s campus the very same day, resulting in the deaths of three people and forcing me, our

1 other organizers, and our student volunteers into lockdown for several hours. In response to student  
2 concern about the issue of gun safety, we are planning campaigns to promote gun safety legislation  
3 in Nevada.

4 11. It is also critical to Rise's effectiveness as an organization to harness student  
5 political power. Organizing and educating students ahead of the 2024 general election is therefore  
6 also one of our major priorities for the year. We are planning extensive registration drives on  
7 UNLV's campus and have specific goals for the number of students we want to register and turnout  
8 to vote. We also aim to have our organizers and volunteers make contact with every student at  
9 UNLV at least three to five times before the election, whether through phone banking or direct  
10 communication on campus, in order to promote voter registration and voting. Over 80% of  
11 UNLV's student population comes from in-state, so the students we register to vote will largely  
12 be Nevada voters. Those attending UNLV from out of state may also choose to register in Nevada  
13 as well, if they wish to make Nevada their residence.

14 12. The lawsuit filed by the Republican National Committee and Nevada Republican  
15 Party, among others, threatens Rise's mission and the work described above.

16 13. In particular, the lawsuit threatens the ability of Rise's constituency—students and  
17 younger people—to vote in the 2024 general election. Student voters are disproportionately likely  
18 to be purged from the voter rolls. Many college students live away from their family homes and  
19 voting residences for long periods of time while at school. They also frequently change their  
20 temporary residence while at school, for example by moving between dorm rooms or off campus  
21 apartments, while still maintaining a permanent residence with family. Due to this frequent  
22 moving, and long stretches away from their voting residence, students often do not receive mailed  
23 notices meant to advise them that their registration is at risk, and only learn later that they have  
24 been purged. Similarly, many college students and young people establish new permanent  
25 residences on or near campus but move frequently within a small area while in school or starting  
26 their careers. These people remain eligible to vote in the same area, but also are likely to not receive  
27 election-related mail concerning their registration status. Any student voter who is purged as a  
28 result of this lawsuit risks never receiving a mail ballot, which is the most common and convenient

1 method of voting in Nevada, diminishing the voting power of Rise's core constituency.

2 14. Furthermore, if this suit is successful, it will derail Rise's planned campaign work  
 3 for the year. If thousands of voters are purged from Nevada's rolls, our immediate response would  
 4 be to refocus our volunteer phone banking efforts towards educating students about the purge and  
 5 how to confirm their registration status. Given the centrality of voting to our mission, this would  
 6 be our top priority through the election. In view of our limited resources, however, this effort  
 7 would come at the expense of our already planned phone banking around the issue of college aid,  
 8 student debt relief, and loan repayment assistance—a key issue for our student constituents. It  
 9 would also reduce our ability to recruit and train new organizers at other schools in Nevada, as our  
 10 limited staff resources would be focused on first ensuring that student voters are able to  
 11 successfully cast a ballot.

12 15. Both of these impacts would severely harm Rise's mission. We cannot successfully  
 13 realize our mission as an organization if our student constituents are not able to successfully cast  
 14 a ballot and make their voices heard. Similarly, our ability to expand our work and operations in  
 15 Nevada will be hampered if we have to respond to a last minute and rushed voter purge that is  
 16 likely to disproportionately harm student voters.

17 I declare under penalty of perjury that the foregoing is true and correct.

18 *Christian Solomon*

19 Executed on: 3/21/2024

20 Christian Solomon